

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ALICIA M. PAGE, CARMEL COOPER, and  
CINDY MUNIZ, individually, and on behalf of all  
others similarly situated

*Plaintiffs,*

v.

ALLIANT CREDIT UNION, *and*  
DOES 1-100,

*Defendants.*

Case No. 19-cv-05965

Hon. Sharon Johnson Coleman

**DECLARATION OF CHARLES A. DEVORE  
IN SUPPORT OF DEFENDANT ALLIANT CREDIT UNION'S  
MOTION TO DISMISS ALL CLAIMS BROUGHT BY PLAINTIFF  
ALICIA PAGE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(b)(6)**

I, Charles A. DeVore, declare and state as follows:

1. I am an attorney licensed by the State of Illinois. I am counsel for Defendant Alliant Credit Union in the above-captioned case.

2. Attached hereto as **Exhibit A** is a true and correct copy of the 2019 NACHA Operating Rules, Subsection 2.12.4, *Reinitiating of Returned Entries*. The NACHA Rules are incorporated by reference into Alliant's Membership Agreement, which is itself incorporated by reference and attached to Ms. Page's Complaint. Compl., Dkt. No. 1, Exs. D, E.

3. Attached hereto as **Exhibit B** is a true and correct excerpt from Ms. Alicia Page's monthly statement for her account with Alliant Credit Union for the period ending on January 31, 2017. Ms. Page incorporates this document by reference into her Complaint, Dkt. No. 1, at ¶¶ 46, 47. To protect Ms. Page's privacy, I have redacted or excluded Ms. Page's personal information and all transactions not relevant to Alliant's motion to dismiss.

4. Attached hereto as **Exhibit C** are true and correct copies of all unpublished cases cited in Alliant's motion to dismiss.

/s/ Charles A. DeVore  
Charles A. DeVore